

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

JANE DOE,)	
)	
Plaintiff,)	Case No.: 5:18-cv-01100-BKS-TWD
)	
v.)	
)	
)	MOTION TO WITHDRAW AS
)	COUNSEL OF RECORD
SYRACUSE UNIVERSITY,)	
)	
)	
Defendant.)	

Pursuant to Local Rule 83.2, Park Legal Counsel Group, PLLC (“Movant”) hereby notifies the Court and the parties of its intent to withdraw as counsel for Plaintiff. Movant states the following grounds for this notice and motion:

1. Movant has experienced irreconcilable differences with its client Jane Doe regarding Movant’s further representation even though Movant clearly explained to Jane Doe regarding the limited scope and time of representation and further schedules in this case since the Defendant’s motion to dismiss the complaint was filed against her.
2. Jane Doe has been given additional time to respond to the Defendant’s motion to dismiss the complaint. Jane Doe’s response due date has been extended to December 28, 2018 and Defendant’s reply to January 7, 2019. A hearing on the motion will be scheduled if deemed necessary by the Court. This withdrawal motion will not cause any prejudice or delay to the parties in this case. Jane Doe has at all times been informed and aware of the motion

and the limited scope of Movant's representation and the need for Plaintiff to obtain new representation.

WHEREFORE, Movant requests respectfully that this Court grant Park Legal Counsel Group, PLLC leave to withdraw as counsel in the above-captioned matter, and enter an order stating that Movant has so withdrawn.

Dated: December 3, 2018

Respectfully Submitted,

Park Legal Counsel Group, PLLC

By: /s/ Joon H. Park

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I do hereby certify that I have on December 3, 2018 electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of filing to counsel of record.

/s/ Joon H. Park
Joon H. Park

